

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

**This document relates to:**

*County of Summit, et al. v. Purdue Pharma, L.P.  
et al.*, Case No. 18-op-45090;

*The County of Cuyahoga, Ohio, et al. v.  
Purdue Pharma L.P., et al.*,  
Case No. 17-op-45004.

**MDL No. 2804**

**Case No. 1:17-md-2804**

**Judge Dan Aaron Polster**

**PLAINTIFFS' MOTION FOR LEAVE TO  
FILE AMENDMENT UNDER SEAL**

Pursuant to Local Rule 5.2, Plaintiffs County of Summit, Ohio and County of Cuyahoga, Ohio (collectively, "Plaintiffs") seek leave to file their proposed Amendments by Interlineation to their Third Amended Complaints under seal.

Local Rule 5.2 states: "No document will be accepted for filing under seal unless a statute, court rule, or prior court order authorizes the filing of sealed documents." Loc. R. 5.2.

Plaintiffs' Amendments by Interlineation contain information that has been subject to Protective and Confidentiality Orders, including: (1) Protective Order re the DEA ARCOS/DADS Database ("ARCOS Protective Order") (Docket # 1545); and (2) Case Management Order No. 2 and the amendment thereto (Docket #s 441 & 1357). This information is subject to this Court's Order Amending Procedures Regarding Redactions and Filing of Briefs Under Seal (Docket # 1813). Plaintiffs do not believe that the information warrants remaining under seal, but seek to comply with all applicable Orders concerning information that has been marked or designated as confidential.

Plaintiffs respectfully request to proceed in this manner so there are no inadvertent disclosures of information subject to Protective Orders and to comply with this Court's orders.

WHEREFORE, Plaintiffs respectfully request the Honorable Court to grant Plaintiffs' Motion for Leave to File their Amendments by Interlineation Under Seal and to direct Defendants to indicate within three (3) business days whether they will assert any redactions.

Dated: October 29, 2019

Respectfully submitted,

/s/ Linda Singer

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29<sup>th</sup> day of October, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF System.

/s/ Linda Singer

Linda Singer  
*Attorney for Plaintiff Summit County, Ohio*